

Whistleblowing Policy

Policy Owner: Jody Walker

Approved by: Managing Director

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Introduction and Purpose

OSI is committed to the highest standards of openness, honesty, and accountability. In line with this commitment, we have established this Whistleblowing Policy to encourage and protect individuals who wish to raise concerns about wrongdoing within the company. “Whistleblowing” is the term used when an employee (or other worker) reports suspected wrongdoing or dangers at work, which might include criminal activity, breaches of legal obligations, miscarriages of justice, health and safety hazards, environmental damage, or attempts to cover up any of these. The purpose of this policy is to provide a safe and confidential way for concerns to be raised, so that they can be investigated and addressed promptly. This policy applies to all OSI employees, as well as contractors, agency staff, consultants, or any other individuals who work with us. It reflects the protections afforded under the UK Public Interest Disclosure Act 1998, which protects whistleblowers from retaliation.

Scope of Whistleblowing

A whistleblowing concern typically relates to something you have witnessed at work that you genuinely believe is wrongful or dangerous, and which is in the public interest to report.

Examples of matters that should be reported under this policy include:

- Criminal offences (such as theft, fraud, bribery or corruption).
- A failure to comply with legal obligations or regulatory requirements.
- Miscarriages of justice.
- Endangering the health or safety of individuals (e.g. unsafe working practices or serious breaches of Health & Safety rules).
- Damage to the environment (for example, improper disposal of hazardous waste).
- Any form of modern slavery or human trafficking in OSI’s operations or supply chain.
- Deliberate concealment of information relating to any of the above.

Personal grievances (such as harassment, discrimination, or employment disputes) are generally not whistleblowing issues and should be reported through our Grievance Policy or Harassment & Bullying Policy. However, if your concern is about a systemic issue or one of the public interest matters listed above, it should be raised as whistleblowing. If you are uncertain whether a concern qualifies as whistleblowing, we encourage you to seek guidance from a Director or the designated Whistleblowing Officer.

How to Raise a Concern

OSI provides multiple channels to raise a whistleblowing concern confidentially:

Internal Reporting to Management: In the first instance, we encourage employees to report concerns to their immediate supervisor or manager. The manager should then escalate the matter to the appropriate senior level (Director) if the concern is credible and serious.

Direct to a Company Director: If you feel unable to speak to your direct manager (for example, if the manager is involved in the wrongdoing or has not addressed your concern), you should contact a Director of OSI directly. You can do this in person, by phone, or in writing. We have designated [Name of a Senior Manager or Director] as the Whistleblowing Officer, responsible for overseeing whistleblowing reports. You may email them at [confidential email address] or send a sealed letter marked “Private and Confidential – To be opened by Addressee only”.

Anonymous Reporting: We encourage whistleblowers to give their names when reporting, as this can aid investigation. However, we understand you may wish to remain anonymous. Anonymous reports will still be considered and investigated as far as possible, though complete anonymity can make it more difficult to seek further information and provide feedback. If you do remain anonymous, please provide as much detail and evidence as possible to allow a proper review.

When raising a concern, please provide clear information about the issue: what is happening, when and where it occurred, who is involved, and any evidence you have or know of. You do not need to have proof of wrongdoing, but any supporting details are helpful. The earlier a concern is raised, the easier it is for OSI to take action.

Protection and Confidentiality

OSI understands that whistleblowers may worry about potential repercussions. We want to reassure all staff that you will not suffer any detrimental treatment (such as dismissal, disciplinary action, threats, harassment, or any other disadvantage) for reporting a genuine concern in good faith. This protection applies even if the concern turns out to be mistaken, provided you reasonably believed it to be true. Retaliation against a whistleblower is a serious disciplinary offence and will be addressed accordingly. If you believe you are experiencing retaliation, report it immediately to a Director.

We will handle all whistleblowing reports in a confidential manner. The identity of the whistleblower will be kept confidential, and only those directly involved in investigating and resolving the concern will be informed of it. In the course of investigation, it might become necessary to reveal certain information (for example, if external legal or law enforcement advice is sought), but we will discuss with the whistleblower beforehand whenever possible. Anonymous reports will obviously remain confidential, but again, limited information may be shared internally on a “need-to-know” basis to conduct a proper investigation.

Investigation and Outcome

Once a whistleblowing concern is received, OSI will promptly assess the information and decide on the appropriate course of action. This may involve an internal investigation by management or, if the matter is serious and requires specialist expertise, an independent inquiry (which could include external auditors or involving law enforcement/regulators). The whistleblower's information will be reviewed impartially and evidence will be gathered from relevant sources (documents, interviews with potential witnesses, etc.). The timeline for investigation will depend on the complexity of the issue, but we aim to resolve most internal investigations within a few weeks.

After the investigation, appropriate action will be taken if the concern is substantiated. This could range from disciplinary action against wrongdoers (up to and including dismissal or legal action) to changes in company procedures to prevent future issues. The whistleblower will be informed that the matter has been addressed and, if possible, given general feedback on the outcome (though specific details might be limited by privacy or legal constraints). If the investigation finds that the concern was unfounded but raised in good faith, no action will be taken against the whistleblower or anyone involved. However, if a report is found to have been made maliciously or knowingly false, this will be regarded as misconduct and handled through our disciplinary process.

Escalation to External Authorities

This policy is intended to provide an internal mechanism for reporting, investigating, and remedying wrongdoing in the company. In most cases, whistleblowers should not find it necessary to alert anyone externally. However, if you have reported a concern internally and you believe OSI has not taken appropriate action, or if you feel unable to report the issue internally at all, you have the right to report the matter to an appropriate external body (known as a "prescribed person" under whistleblowing law). Such bodies may include relevant regulators (e.g. the Health and Safety Executive for safety issues, the Information Commissioner's Office for data protection issues, or the Police for criminal matters). OSI would rather you report to a prescribed external body than not at all. We encourage you to seek advice before going external – for example, from the independent charity Protect (formerly Public Concern at Work), which can advise on whistleblowing. Remember that to retain protection under whistleblowing law when reporting externally, you must reasonably believe the information is true and you must report to the correct prescribed person.

Review

OSI's Board of Directors (or designated Whistleblowing Officer) will review this Whistleblowing Policy annually and after any incident of whistleblowing to ensure it is effective and up-to-date with current law. All employees will be reminded of this policy's provisions periodically (for instance, via training or internal communications). We are committed to creating a culture where employees feel safe to speak up about concerns – this is essential for our integrity and accountability as a supplier to the public sector and as an employer. By following this policy, employees help OSI to address problems early and maintain the trust of our clients and the public.

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